

REMARKS

Claims 1-40 are pending in the application. In the Office Action mailed December 10, 2004, claim 15 is objected to because of an informality. Claims 8 and 15 stand rejected under 35 U.S.C. 112, second paragraph, as being indefinite. Claims 1-2, 20-23, 39, and 40 stand rejected under 35 U.S.C. 103(a) as being unpatentable over PCT Published Application WO 99/33226 (Coveley et al, hereinafter "Coveley") in view of U.S. Pat. No. 6,535,746 (Yu et al, hereinafter "Yu"). Claims 3, 4, 24, and 25 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Coveley and Yu as applied to claims 1 and 2, and further in view of European Patent Application EP 0777394 A1 (Belpaire). Claims 5 and 26 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Coveley and Yu as applied to claim 1, in view of US Published Application 2001/0016495 (Chandnani et al, hereinafter "Chandnani"). Claims 6, 7, 27, and 28 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Coveley, Yu, and Chandnani as applied to claim 5, in view of U.S. Pat. No. 6,735,439 (Bowman et al, hereinafter "Bowman"). Claim 8 stands rejected under 35 U.S.C. 103(a) as being unpatentable over Coveley, Yu, Chandnani, and Bowman as applied to claim 7, in view of Belpaire. Claims 9-11 and 29-31 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Coveley and Yu as applied to claim 1, and further in view of U.S. Pat. No. 6,560,456 (Lohtia et al, hereinafter "Lohtia"). Claims 12-14 and 32-34 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Coveley, Yu, and Lohtia, as applied to claim 10, in view of Official Notice. Claim 15 stands rejected under 35 U.S.C. 103(a) as being unpatentable over Coveley, Yu, Lohtia, and Official Notice as applied to claim 14, in view of U.S. Pat. No. 6,094,587 (Armanto et al, hereinafter "Armanto"). Claims 16 and 35 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Coveley and Yu as applied to claim 1, and further in view of U.S. Pat. No. 6,462,646 (Helferich). Claims 17, 18, 36, and 37 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Coveley, Yu, and Helferich as applied to claim 16, and further in view of U.S. Pat. No. 6,549,937 (Auerbach et al, hereinafter "Auerbach"). Claims 19 and 38 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Coveley, Yu, Helferich, and Auerbach as applied to claim 18, and further in view of Belpaire.

The Applicants acknowledge with gratitude the Examiner's extremely detailed office action, which has assisted the Applicants greatly in clearly defining the scope of the claimed invention.

I. Amendments to the Specification

The Applicants have amended paragraphs [0004] and [0065] of the specification (as published) to correct typographical errors. No new matter has been added by these amendments.

II. Claim Informalities

Claim 15 is objected to because of an informality. The Applicants have amended claim 15 to add the missing comma and thank the Examiner for pointing out this omission. Withdrawal of the objection to claim 15, as amended, is now respectfully requested.

In addition, the Applicants have also amended claims 4, 14, 25, 33, and 34 in order to correct additional typographical errors.

III. Rejections under 35 U.S.C. 112, second paragraph

Claims 8 and 15 stand rejected under 35 U.S.C. 112, second paragraph, as being indefinite for insufficient antecedent basis. The Applicants have amended claims 8 and 15 to provide the required antecedent basis. Withdrawal of the rejections under 35 U.S.C. 112, second paragraph, of claims 8 and 15, as amended, is now respectfully requested.

IV. Rejections under 35 U.S.C. 103(a)

Claims 1-2, 20-23, 39, and 40 stand rejected under 35 U.S.C. 103(a) as being unpatentable over PCT Published Application WO 99/33226 (Coveley) in view of U.S. Pat. No. 6,535,746 (Yu). The Applicants respectfully traverse the Examiner's rejections. Coveley and Yu do not render obvious the Applicants' invention, whether taken alone or in combination with each other or any other art of record. The Applicants' invention is a method and apparatus for routing a message from a sender in a first digital mobile network to an intended receiver in a second, different digital mobile network by reformatting the original routing information associated with the message into a corresponding routing format as specified by a routing database, in order to allow transmission of the message between noncompatible digital mobile networks. This reformatting of the routing information is transparent to the sender and the receiver of the message, and the message body remains unchanged (specification, as published, at, e.g., paragraphs [0038], [0046], [0056]-[0057], [0062], and [0130]-[0131]). The Applicant's invention facilitates the transmission of the message from the sender to the specified receiving

mobile network; it does not redirect the message from the specified receiving mobile network to another mobile network.

In contrast, in the method of Coveley et al, the communications server converts the received message to a protocol that is compatible with the destination network and then sends the processed message to the destination [Coveley at, e.g., p. 13, lines 5-25]. The method of Coveley et al is therefore quite different from the invention of the Applicants, as Coveley et al convert the entire message to the format of the destination network whereas, in the method of the Applicants, only the message routing information is reformatted, not the message body itself. The steps of relating and forwarding to a receiver of Coveley are therefore not equivalent to the claimed steps of relating and forwarding to a receiver of the Applicants. The method of Coveley et al therefore does not disclose or render obvious the Applicants' invention, alone or in combination with any other art of record.

The method of Yu et al also does not disclose or render obvious the Applicants' invention, alone or in combination with any other art of record. In Yu, wireless number portability is implemented by redirecting a message from the destination mobile network to another mobile network to whom the intended recipient has switched [Yu at, e.g., col. 4, lines 21-37]. The method of Yu et al is therefore quite different from the invention of the Applicants, as Yu employs no reformatting of the routing information and does nothing to facilitate transmission between the sender and the original destination mobile network when the sending and receiving networks are noncompatible. The steps of relating and forwarding to a receiver of Yu are therefore not equivalent to the claimed steps of relating and forwarding to a receiver of the Applicants.

In order to more clearly explain the Applicants' invention, it may be helpful to draw an analogy to the delivery of a paper letter. In such an analogy, the technology of Yu et al is similar to the change of address label process that the post office engages in when a recipient has moved, merely adding an additional label that redirects the letter, as is, from the old to the new mailbox, without any translation or modification of the original information on the envelope. In this analogy, the system of Coveley et al would then be akin to opening the letter, determining that it is written in German and that the intended recipient only speaks English, translating the letter from German to English, and then sending the translation to the intended recipient. In contrast, the Applicants' invention would involve looking at the address information on the envelope, determining that it is written in German and that the language used at the intended destination post office is English, translating the envelope information to English in order to allow for proper

delivery to the intended recipient, and then forwarding the letter on without ever opening it or changing its contents.

In order to more particularly call out and define the Applicants' invention, the Applicants have herein amended claims 1 and 22 in order to clarify that the Applicants' invention reformats the message routing information, while leaving the message body as is. Consequently, the Applicants have amended independent claims 1 and 22 to call out the step of reformatting said associated message routing information in a format specified by said corresponding routing format information, wherein the reformatting is transparent to a sender and receiver of the message and the message body remains unchanged. Support for these amendments is found at least at paragraphs [0028], [0038], [0046], [0056]-[0057], [0062]-[0065], [0078]-[0079], [0108]-[0109], [0129]-[0131], [0136], and [0152]-[0185] of the published application, Fig. 2 (elements 92, 96), Fig. 3 (elements 174, 180), Fig. 4 (elements 228, 232, 234), and the Abstract. This method of routing a message from a sender in a first digital mobile network to an intended receiver in a second different digital mobile network is not shown in the art of record nor in any other prior art. Allowance of claims 1 and 22, as amended, is therefore respectfully requested.

Claims 2 and 23 have now been cancelled. Because claims 20 and 21 depend from currently amended independent claim 1, which is now in condition for allowance, the Applicants believe that claims 20 and 21 are also now in condition for allowance. Similarly, because claims 39 and 40 depend from currently amended independent claim 22, which is now in condition for allowance, the applicants believe that claims 39 and 40 are also now in condition for allowance. Allowance of claims 20, 21, 39, and 40 is therefore respectfully requested.

Claims 3, 4, 24, and 25 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Coveley and Yu in view of Belpaire. Claims 5 and 26 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Coveley and Yu in view of Chandnani. Claims 6, 7, 27, and 28 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Coveley, Yu, and Chandnani in view of Bowman. Claim 8 stands rejected under 35 U.S.C. 103(a) as being unpatentable over Coveley, Yu, Chandnani, and Bowman in view of Belpaire. Claims 9-11 and 29-31 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Coveley and Yu in view of Lohtia. Claims 12-14 and 32-34 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Coveley, Yu, and Lohtia, in view of Official Notice. Claim 15 stands rejected under 35 U.S.C. 103(a) as being unpatentable over Coveley, Yu, Lohtia, and Official Notice in view of Armanto. Claims 16 and 35 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Coveley and Yu in view of Helferich. Claims 17, 18, 36, and 37 stand rejected under 35 U.S.C. 103(a) as being unpatentable

over Coveley, Yu, and Helferich in view of Auerbach. Claims 19 and 38 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Coveley, Yu, Helferich, and Auerbach in view of Belpaire.

Because claims 3-19 depend from currently amended independent claim 1, which is now in condition for allowance, the Applicants believe that claims 3-19 are also now in condition for allowance. Similarly, because claims 24-38 depend from currently amended independent claim 22, which is now in condition for allowance, the Applicants believe that claims 24-38 are also now in condition for allowance. Allowance of claims 3-19 and 24-28 is therefore respectfully requested.

V. Change of Correspondence Address

The Applicants respectfully request that the correspondence address for this application be changed to:

Norma E. Henderson, Esq.
Hinckley, Allen & Snyder LLP
43 North Main Street, 2nd floor
Concord, NH 03301-4934
Tel: 603-225-4334
Fax: 603-224-8350

A Change of Correspondence address/Power of Attorney, Revocation of Power of Attorney, and Assignee statement under 37 CFR 3.73(b) are being filed herewith.

VI. Conclusion


Claims 1, 4, 8, 14, 15, 22, 25, 33, and 34 have been amended. Claims 2 and 23 have been cancelled. The Applicants respectfully submit that claims 1, 3-22, and 24-40 are now in condition for allowance. For this reason, and in view of the foregoing arguments, the Applicants believe that this application is now in condition for allowance, which action is earnestly solicited. Should there remain any unresolved issues, it is respectfully requested that the Examiner telephone Norma E. Henderson, Applicants' Attorney, at 603-225-4334, so that such issues may be resolved as expeditiously as possible.

Respectfully Submitted,

Hinckley, Allen & Snyder LLP

May 10, 2005

Date

By: 

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